

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

HOWARD C. LAPENSOHN
and JILL ABRAMS LAPENSOHN

Plaintiffs,

v.

HUDSON CITY SAVINGS BANK,
VOYAGER INDEMNITY INSURANCE
COMPANY and PARKER IBRAHIM &
BERG,

Defendants.

CIVIL ACTION

No. 2:20-cv-00680-JMG

STIPULATION FOR EXTENSION OF TIME

AND NOW this 15th day of April 2020, it is hereby STIPULATED and AGREED between counsel for Defendant Voyager Indemnity Insurance Company ("Voyager"), and counsel for Plaintiffs Howard C. Lapensohn and Jill Abrams Lapensohn ("Plaintiffs"), that Voyager shall have a seven (7) day extension of time in which to file its response to Plaintiffs' Complaint. Good cause exists for the extension because the 2019 novel coronavirus, COVID 19, has delayed regular business operations, necessitating additional time for Voyager to investigate the Complaint and to allow Voyager's counsel to discuss directly with Plaintiffs' counsel the substance of Voyager's contemplated motion to dismiss. This extension will expire on **April 24, 2020**.

**ROYER COOPER COHEN
BRAUNFELD LLC**

By: /s/ Matthew Faranda-Diedrich

Matthew Faranda-Diedrich, Esquire
Alexander J. Nassar, Esquire
Attorneys for Defendant Voyager
Indemnity Insurance Company

JOSHUA L. THOMAS & ASSOCIATES

By: /s/ Joshua L. Thomas

Joshua Louis Thomas, Esquire
Attorney for Plaintiffs Howard C.
Lapensohn and Jill Abrams Lapensohn

BY THE COURT:

John M. Gallagher
John M. Gallagher

United States District Court Judge